

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS LOCAL 98  
PENSION FUND on behalf of itself and all  
others similarly situated,

Plaintiff,

vs.

DELOITTE & TOUCHE, LLP;  
DELOITTE LLP,

Defendants.

Case No. 3:19-cv-3304

**CLASS ACTION**

**LEAD PLAINTIFF'S NOTICE OF COMPLIANCE  
AND CERTIFICATION OF DISCLOSURE**

Lead Plaintiff International Brotherhood of Electrical Workers Local 98 Pension Fund, by and through undersigned counsel, and in accordance with the Fifth Amended Consent Scheduling Order, ECF No. 229, gives notice that it has identified the persons whom it expects to call as experts as trial and certifies that this notice has been served upon counsel for the Defendants on August 30, 2024. Lead Plaintiff reserves the right to disclose any additional experts as permitted by the Federal Rules of Civil Procedure, including at trial for purposes of rebuttal and in response to Defendants' expert disclosures due September 13, 2024.

The following individuals are those who Lead Plaintiff has retained or specially employed to provide expert testimony on the topics below:

1. **Matthew D. Cain, Ph.D.**

c/o Laura Posner  
Cohen Milstein Sellers & Toll PLLC  
88 Pine Street, 14th Floor  
New York, NY 10005  
(212) 220-2925

Topics: Market efficiency; damages; and loss causation

2. **Lynn E. Turner, CPA**

*Hemming Morse LLC*

c/o Laura Posner  
Cohen Milstein Sellers & Toll PLLC  
88 Pine Street, 14th Floor  
New York, NY 10005  
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Topics: Audit and accounting standards and principles, and Defendants' compliance with those standards and principles

3. **Al Ferrer, MS**

*Critical Technologies Consulting LLC*

c/o Laura Posner  
Cohen Milstein Sellers & Toll PLLC  
88 Pine Street, 14th Floor  
New York, NY 10005  
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Topics: Engineering, procurement, and construction of nuclear power plants and facilities; construction project management and oversight; analysis and interpretation of construction schedules, metrics, and productivity; the AP1000 nuclear power plant design; and public utility regulation.

Lead Plaintiff reserves the right to call any expert witness identified or called by Defendants.

Dated: August 30, 2024

Respectfully submitted,

/s/ William Tinkler

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*Additional Counsel for the Proposed Class*